

## REMARKS

With the present response, Applicants propose to amend claims 1, 9, 15, 21, and 30. The amendments are supported by, e.g., FIGS. 1 and 2 and associated text (page 6, line 28 to page 16, line 10) of Applicants' specification.

Claims 21 and 30 stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite. Claims 1-4, 7, 9-12, and 15-18 stand rejected under 35 U.S.C. §102(e) as being anticipated by Axberg et al. (U.S. 6,009,466). Claims 5, 6, 8, 13, 14, 19 and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Axberg in view of the publication "SSA: A High Performance Interface for Unparalleled Connectivity," by Wilson. These rejections are respectfully disagreed with, and are traversed below.

As for the §112, second paragraph, rejections of claims 21 and 30, the Examiner asserted that the subject matter of "preventing" and "allowing" contradict one another and suggested that the actions performed on a controller be claimed as a series of steps.

Applicants have amended claims 21 and 30 to point out that the commanding operation occurs after the preventing and sending operations, and that the allowing operation occurs after the commanding operation. It is noted that the map can be sent to an initiator before or after an initiator is prevented from responding to error messages. Independent claims 21 and 30, as now clarified by amendment, should be found to be free of rejection under 35 U.S.C. §112, second paragraph. This amendment is deemed to be cosmetic in nature, and thus was not made for a reason related to patentability, as the Examiner could have simply objected to these claims, and not rejected them under 35 U.S.C. §112, second paragraph. In any event, this amendment should not be construed to impair in any way the application of the full range of equivalents for the claimed subject matter.

With regard to the §102(e) rejections of claims 1-4, 7, 9-12 and 15-18, Applicants have amended independent claims 1, 9, and 15. In particular, Applicants have amended claim 1

to state “A method performed by a controller coupled to a computer storage network for configuring the computer storage network” (emphasis added). Similar amendments were made to independent claim 9 (“A controller coupled to a computer storage network for configuring thea computer storage network”) and 15 (“A storage media including instructions for controlling a processor coupled to a computer storage network”).

Axberg is used to plan the configuration of a network *prior* to actual implementation of the network. See Abstract of Axberg. Applicants respectfully submit that Axberg does not disclose any operation on any element of an actual computer storage network. Axberg specifically states the following:

For example, one form of output may be a list of instructions for the installer of the storage network. Another form of output may be a graphical illustration of the network. Another form may be a list of addresses and paths for use by a host computer system in accessing storage devices connected to the network. Any of these would typically be done after completion of all configuration, i.e., at step 910, but may be performed at intermediate stages as well.

Axberg, col. 15, lines 50-58. Axberg also states that “[o]utput from the program could be in the form of human-readable diagrams and instructions, or configuration instructions readable by another computer system, or both.” Axberg at col. 16, lines 25-28. A careful reading of Axberg indicates that “configuration instructions” are simply instructions for putting the network together. There is no indication in the cited parts of Axberg or in any other portion of Axberg of “A method performed by a controller coupled to a computer storage network for configuring the computer storage network” in independent claim 1, “A controller coupled to a computer storage network for configuring thea computer storage network” in independent claim 9 and “A storage media including instructions for controlling a processor coupled to a computer storage network” in independent claim 15.

Therefore, independent claims 1, 9, and 15 are patentable over Axberg and Applicants respectfully request the §102(e) rejection to these claims be withdrawn.

Furthermore, Applicants have amended claim 1 to recite in part “sending data to said initiator, said data including a port information map describing a desired state for each of the ports in said plurality of devices” (emphasis added). Similar amendments were made to claims 9 (“means for sending data to said initiator, the data include a port information map describing a desired state for each of the ports in said plurality of devices”) and 15 (“means for controlling said processor to send data to said initiator, the data including a port information map describing a desired state for each of the ports in said plurality of devices”).

The Examiner states that “the cited portions of Axberg show the configuration of an SSA network. The process of configuring an SSA network would inhibit an initiator and set a desired state of network ports.” See outstanding Office Action, part 23, page 7. Applicants respectfully and completely disagree: Axberg does not describe or imply configuring an *actual* SSA network and certainly does not describe or imply inhibiting an initiator or setting a desired state of network ports. Axberg solely describes a program for assisting a user in planning the configuration of devices in a network. Axberg at Abstract. Axberg uses the term “initiator” at col. 8, lines 53-56 (discussing software classes that *represent* initiator adapters, not *actual* initiators in a network), col. 9, lines 1-4 (again discussing software classes that represent initiator adapters), and at col. 9, lines 32-35 (yet again discussing software classes that represent initiator adapters). The recited sections are the extent of the use of the term “initiator” in Axberg.

There is absolutely no disclosure or implication in Axberg of sending data to an initiator, where the data includes a port information map describing a desired state for each of the ports in said plurality of devices, as recited generally in independent claims 1, 9, and 15. Furthermore, there is no reason in Axberg for data to be sent to an initiator, as Axberg is completely unconcerned with operation of initiators, because in Axberg actual implementation of the network is left to installers. Axberg is not directed to an actual, operating network.

Because there is no disclosure or implication in Axberg of sending data to an initiator, where the data includes a port information map describing a desired state for each of the

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ports in said plurality of devices, as recited generally in independent claims 1, 9, and 15, independent claims 1, 9, and 15 are patentable over Axberg.

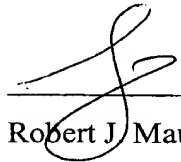
Because independent claims 1, 9, and 15 are patentable over Axberg, dependent claims 2-4, 7, 10-12, and 16-18 are also patentable for at least the reasons given above.

With regard to the §103(a) rejections of claims 5, 6, 8, 13, 14, 19 and 20, because independent claims 1, 9, and 15 are patentable, dependent claims 5, 6, 8, 13, 14, 19 and 20 are patentable for at least the reasons given above.

The Examiner is respectfully requested to reconsider and remove the expressed rejections, and to allow claims 1-31 as now clarified by amendment above.

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